Attachment B
Additional NESHAP, Subpart S, Subpart MM, and Subpart JJJJ Requirements

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Chlorine
Time Period:	3-Hour Average
Process Unit Description:	Bleach Plant Scrubber System
Emission Limits:	Scrubber Outlet Conc. <10 ppmv Cl_2 (40 CFR 63.445 (c)(2))
Operating Parameters:	Scrubber liquid influent (recirculation) flow > 87 gpm Scrubber effluent pH > 10.4 Scrubber fan operational status - ON
Monitor Manufacturer(s) and Model Number(s):	Liquid flow / Foxboro IMT25 PDAD810MAB pH / Great Lakes P63AINIAIN 6LZ
Last CMS Certification or Audit Date:	Flow Meter Audit (Calibration): 6/5/2019 pH (Calibration): 12/23/2019

Total Source Operating Time in Reporting Period: 4,200 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	**Duration**
A. Startup/Shutdown	0 Hour
B. Malfunctions	
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Excess Emissions / Process Operating Time	0.00 %

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	**Duration**
Monitor Equipment Malfunctions	0 Hour
Non-Monitor Equipment Malfunctions	0 Hour
Quality Assurance/Quality Assurance Calibrations	0 Hour
Other Known Causes	0 Hour
Other Unknown Causes	0 Hour
Total Number of Incidents	0
Percent Monitor Downtime	0.00 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Time Period:	15-day rolling average
Process Unit Description:	Condensate Collection and Treatment System
Emission Limits:	Collect 11.1 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3)) Treat (remove) 10.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(5))
Operating Parameters:	Condensate Feed Rate, Condensate Feed Temperature, Steam Flow Effective Steam Ratio (condensate feed rate / (steam flow to column less steam for condensate preheat) > 16 = 92%
Monitor Manufacturer(s) and Model Number(s):	Condensate Flow – Rosemount /3051CD2A22A1JB4L4M6T1F6 Steam Flow - Rosemount /3051CD2A22A1JB4L4M6T1E5 Condensate Temperature – Rosemount/3144D5E5B4T1M5
Last CMS Certification or Audit Date:	Condensate Flow (calibration): 6/27/2019 Steam Flow (calibration): 8/22/19 Condensate Temperature (calibration): 8/20/2019
Total Source Operating Time in Reporting Period:	4,200 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	**Duration**
A. Startup/Shutdown	0 Hour
B. Malfunctions	
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Fuel Problems	0 Hours
Other Known Cause	24 Hour
Other Unknown Cause	0 Hours
Total Number of Incidents	1
Excess Emissions / Process Operating Time	0.57%

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	**Duration**
Monitor Equipment Malfunctions	N/A
Non-Monitor Equipment Malfunctions	N/A
Quality Assurance/Quality Assurance Calibrations	N/A
Other Known Cause	N/A
Other Unknown Cause	N/A
Total Number of Incidents	N/A
Percent Monitor Downtime	N/A

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

SEMI-ANNUAL REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Reporting Period:	January 1, 2020 through June 30, 2020
Process Unit Description:	Condensate Collection and Treatment System
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	Collect 11.1 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3)) Treat (remove) 10.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(5))
Operating Parameters:	Condensate Feed Rate, Condensate Feed Temperature, Steam Flow, Effective Steam Ratio (condensate feed rate / (steam flow to column less steam for condensate preheat) > 16 = 92%

§63.10(c)(5): Date / time during which the CMS was inoperative except for zero and high-level checks:	None
§63.10(c)(6): Date / time during which the CMS was out of control:	None
§63.10(c)(7): Specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during startups, shutdowns, and malfunction of the affected source:	Daily quantity of methanol removed per ODTUBP was low on 3/9/2020 because of high amounts of scaling on the reboiler. The resulting 15 day rolling average of methanol removed per ODTUP was below the minimum allowable level of 10.2 lbs/ODTP.
§63.10(c)(8): Specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during periods other than startups, shutdowns, and malfunction of the affected source:	N/A
§63.10(c)(10): Nature and cause of any malfunction:	Pre-heaters had become clogged, causing reduced foul condensate feed to the stripper. The stripper was brought down for maintenance and the pre-heaters unplugged.
§63.10(c)(11): Corrective action taken or preventive measures adopted:	There was a high amount of scaling on the reboiler. The steam supply to the stripper was kept low, reducing effective steam ratio and treatment efficiency.
§63.10(c)(12): Nature of repairs or adjustments to the CMS that was inoperative or out of control:	N/A
§63.10(c)(13): Total process operating time during the reporting period:	4,200 hours
§63.8(c)(7) and (8): Reporting requirements for a CMS that is out of control:	N/A

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Time Period:	Hours
Process Unit Description:	LVHC System – Combination Boilers
Emission Limits:	Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 1% excluding SSM plan excess emissions.
Operating Parameters:	N/A
Monitor Manufacturer(s) and Model Number(s):	N/A
Last CMS Certification or Audit Date:	N/A
Total Source Operating Time in Reporting Period:	4,200 hours

EMISSION DATA SUMMARY

Note: Specific incidents are shown on the attached log for. SSM purposes

	Reason for Excess Emissions	**Duration**
A.	Startup/Shutdown	0.36 Hours
B.	Malfunctions	
	Process/Instrument System	3.15 Hours
	Control/Operating/Collection	0.0 Hours
	Other Known Cause	7.53 Hours
	Other Unknown Cause	0.62 Hours
	Total Number of Incidents	32
	Excess Emissions / Process Operating Time	0.28 %
	Total Duration of Excess Emissions excluding SSM Plan Excess Emissions/ Process Operating Time	0.27%

CMS PERFORMANCE SUMMARY

A CMS is not required when LVHC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Time Period:	Hours
Process Unit Description:	HVLC System – Combination Boilers
Emission Limits:	Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 4% excluding SSM plan excess emissions.
Operating Parameters:	N/A
Monitor Manufacturer(s) and Model Number(s):	N/A
Last CMS Certification or Audit Date:	N/A
Total Source Operating Time in Reporting Period:	4,200 hours

EMISSION DATA SUMMARY

Note: Specific incidents are shown on the attached log for. SSM purposes

Reason for Excess Emissions	**Duration**
A. Startup/Shutdown	0.58 Hour
B. Malfunctions	
Process/Instrument System	0.1 Hours
Control/Operating/Collection	0.0 Hours
Other Known Cause	2.68 Hours
Other Unknown Cause	0.28 Hour
Total Number of Incidents	23
Excess Emissions / Process Operating Time	0.09%
Total Duration of Excess Emissions excluding SSM Plan Excess Emissions/ Process Operating Time	0.07%

CMS PERFORMANCE SUMMARY

A CMS is not required when HVLC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

The location of Subpart MM information is detailed in Table MM-1 below.

Table MM-1. Subpart MM Information

Equipment ID	Source Description	Subpart MM Information Location
2505	No. 2 Recovery Furnace	Main Report Section TV-2440-0005, Condition C.39
5105	No. 3 Recovery Furnace	Main Report Section TV-2440-0005, Condition C.41
2723	No. 2 Lime Kiln	Main Report Section TV-2440-0005, Condition C.39
2510, 5110	No. 2 and No. 3 Smelt Dissolving Tank Vent	Tables MM-2 and MM-3, below

Table MM-2. Smelt Dissolving Tank Opacity Monitoring

Process Unit Description:	No. 2 and No. 3 Smelt Dissolving Tank Vent
Pollutant:	Particulate Matter
Time Period:	Hours
Emission Limits:	0.2 lbs/ton BLS
Operating Parameters:	Differential Pressure > 1.5 inches of water column Liquid Flow Rate > 65 gpm
Monitor Manufacturer(s) and Model Number(s):	DP – Rosemount 3051CD2A02A1AM5E55 Liquid Flow Rate – Foxboro IMT25PDAB10N-AB
Last CMS Certification or Audit Date:	Certification: August 3, 2004 (both) Audits: 11/18/19 (both)
Total Source Operating Time in Reporting Period:	4,200 hours

Table MM-3. Smelt Dissolving Tank Excess Emissions and Downtime Summary

Excess Emissions Summary		
Reason for Excess Emissions	**Duration (hrs)**	
	Differential Pressure Duration (hrs)	**Liquid Flow Rate Duration (hrs)**
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	0	0
Fuel Problems	0	0
Other Known Cause	0	0
Other Unknown Cause	0	0
Total Number of Incidents	0	0
Excess Emissions/Process Operating Time	0.00%	0.00%
Monitor Downtime Summary		
Reason for Monitor Downtime	**Duration (hrs)**	
Monitor Equipment Malfunctions	0	0
Non-Monitor Equipment Malfunctions	0	0
Quality Assurance	0	0
Other Known Cause	0	0
Other Unknown Cause	0	0
Total Number of Incidents	0	0
Percent Monitor Downtime	0.00%	0.00%

The No. 2 Paper Machine was indefinitely idled in June 2017, with no anticipated re-start date. No. 1 Paper Machine has been idle for several years. Therefore, there was no activity related to Subpart JJJJ during the semi-annual period.

Source	Description of Compliance	Operating Time (hrs)	Description and Cause of Deviations
No. 1 Paper Machine Coater	Each coating material as-applied contains less than 0.04 kg organic HAP per kg coating weight.	0	No deviations occurred during reporting period.
No. 2 Paper Machine Coater	Each coating material as-applied contains less than 0.04 kg organic HAP per kg coating weight.	0	No deviations occurred during reporting period.